

**BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2020-229-E**

IN RE:)	
Dominion Energy South Carolina)	
Incorporated's Establishment of a Solar)	Petition to Intervene of the
Choice Metering Tariff Pursuant to S.C.)	Solar Energy Industries Association
Code Ann. Section 58-40-20)	

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), the Solar Energy Industries Association ("SEIA") hereby respectfully petitions to intervene in the above-captioned docket for the *Establishment of Solar Choice Net Metering Tariffs* for Dominion Energy South Carolina. In support of this Petition, SEIA states as follows:

1. SEIA is the national trade association of the U.S. solar energy industry, which now employs more than 260,000 Americans. SEIA represents organizations that promote, manufacture, install and support the development of solar energy.

2. SEIA works with its 1,000 member companies to build jobs and diversity, champion the use of cost-competitive solar in America, remove market barriers and educate the public on the benefits of solar energy.

3. Since 1974, SEIA has been a driving force behind solar energy and building a strong solar industry to power America consistent with its mission to work towards a transformed energy supply and delivery system, such that solar electric and thermal technologies, in collaboration with other clean, reliable, affordable renewable resources and storage, fuel this country's economy.

4. SEIA's membership includes many national solar companies that own and operate projects in South Carolina who have local employees as well as companies that list a specific operating address in South Carolina.

5. SEIA's members, including its members in South Carolina, are engaged in manufacturing solar photovoltaic equipment, developing solar photovoltaic projects, providing solar energy equipment, services and expertise to retail, commercial and industrial customers.

6. SEIA member companies develop, construct, own, operate, finance, and otherwise service solar generating facilities across the state operating under the current net metering structure in South Carolina.

7. SEIA member companies are planning to develop, construct, own, operate, and otherwise service future solar projects in South Carolina, the success of which will rely on the outcome of this proceeding.

8. Consistent with its mission, SEIA engages in advocacy and education to foster solar development by expanding markets, removing market barriers, and educating the public on the benefits of solar energy. SEIA actively participates in state utility regulatory commission proceedings, testifies before state legislative bodies, and hosts seminars and events on solar policy issues around the country.

9. SEIA's principal place of business 1425 K St NW, Suite 1000, Washington, D.C. 20005.

10. SEIA is represented in this proceeding by its undersigned counsel who is duly licensed to practice law in the State of South Carolina and SEIA requests undersigned counsel be added to the official service list:

Jeffrey W. Kuykendall Attorney at Law
 South Carolina Bar No. 102538
 127 King St., Ste. 208
 Charleston, SC 29401
 Phone: 843.790.5182
 Facsimile: 866.733.1909
 Jwkuykendall@jwklegal.com

11. SEIA consents to service via electronic mail and requests that all filings and communications regarding this docket be directed to SEIA's counsel of record and that copies of the same be provided to the following persons:

Sean Gallagher
 Vice President, State Affairs
 Solar Energy Industries Association
 1425 K. Street, NW, Suite 1000
 Washington, D.C. 20005
 Phone: (415) 261-7198
 Email: sgallagher@seia.org

Beren Argetsinger
 Keyes & Fox LLP
 PO Box 166
 Burdett, NY 14818
 Phone: (914) 409-8915
 Email: bargetsinger@keyesfox.com

Scott Elias
 Senior Manager of Programs & State Affairs
 Solar Energy Industries Association
 1425 K. Street, NW, Suite 1000
 Washington, D.C. 20005
 Phone: (202) 556-2892
 Email: selias@seia.org

12. SEIA has been active in using its experience and perspective to help to shape energy policy in South Carolina. SEIA was directly involved in the legislative process that resulted in Act 62, "The Energy Freedom Act," which prompted this proceeding and SEIA is an active party in Docket No. 2019-182-E, the *Generic Docket to (1) Investigate and Determine the Costs and Benefits of the Current Net Energy Metering Program and (2) Establish a Methodology for Calculating the Value of the Energy Produced by Customer-Generators*. Contemporaneous with this filing, SEIA is filing petitions to intervene in Docket Nos. 2020-264-E and 2020-265-E for *the Establishment of Solar Choice Net Metering Tariffs* for Duke Energy Carolinas, LLC and Duke Energy Progress, LLC.

13. SEIA has extensive experience and unique industry insights regarding the subject matters at issue in this proceeding and SEIA's participation will contribute to the development of a record upon which the Commission may make determinations consistent with the requirements of the Energy Freedom Act.

14. SEIA will substantially and specifically be affected by the result of this proceeding.

15. No other party will adequately represent SEIA's interests in this proceeding.

WHEREFORE, SEIA respectfully requests that the Commission grant this petition to intervene and allow SEIA to participate fully as a party in the above captioned proceeding so SEIA may protect its unique and substantial interests.

Respectfully Submitted,

/s/ Jeffrey W. Kuykendall

Jeffrey W. Kuykendall Attorney at Law
South Carolina Bar No. 102538
127 King St., Ste. 208
Charleston, SC 29401
Phone: 843.790.5182
Facsimile: 866.733.1909
Email: Jwkuykendall@jwklegal.com

Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that all persons on the docket service list have been served true and accurate copies of the foregoing Petition to Intervene by hand delivery, first class mail deposited in the U.S. mail, postage pre-paid, or by email transmission with the party's consent.

This the 6th day of November, 2020.

/s/ Jeffrey W. Kuykendall

Jeffrey W. Kuykendall Attorney at Law
South Carolina Bar No. 102538
127 King St., Ste. 208
Charleston, SC 29401
Phone: 843.790.5182
Facsimile: 866.733.1909
Email: Jwkuykendall@jwklegal.com

PARTIES SERVED

Carri Grube Lybarker* , Counsel
South Carolina Department of Consumer
Affairs
Email: clybarker@scconsumer.gov
Phone: 803-734-4297
Fax: 803-734-4287

Jeffrey M. Nelson , Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
Email: jnelson@ors.sc.gov
Phone: 803-737-0800
Fax: 803-737-0895

Jenny R. Pittman , Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
Email: jpittman@ors.sc.gov
Phone: 803-737-0889/0794
Fax: 803-737-0895

K. Chad Burgess , Director & Deputy
General Counsel
Dominion Energy Southeast Services,
Incorporated
220 Operation Way - MC C222
Cayce, SC 29033
Email: chad.burgess@dominionenergy.com
Phone: 803-217-8141

Matthew W. Gissendanner , Senior Counsel
Dominion Energy South Carolina,
Incorporated
220 Operation Way - MC C222
Cayce, SC 29033-3701
Email: matthew.gissendanner@dominionenergy.com
Phone: 803-217-5359
Fax: 803-217-7931

R. Taylor Speer , Counsel
Turner, Padget, Graham & Laney, P.A.
Post Office Box 1509, Greenville SC 29602
200 Broad Street, Suite 250
Greenville, SC 29601
Email: tspeer@turnerpadget.com
Phone: 864-552-4618

Roger P. Hall* , Assistant Consumer
Advocate
South Carolina Department of Consumer
Affairs
Post Office Box 5757
Columbia, SC 29250
Email: rhall@scconsumer.gov
Phone: 803-734-4240

Thadeus B Culley , Regional Director
Vote Solar
1911 Ephesus Church Road
**PENDING Petition to
Intervene*****
Chapel Hill, NC 27517
Email: thad@votesolar.org
Phone: 8032523300